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22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 DEYANNIA SHIPP,

Case No.: 2:24-cv-02062-GMN-EJY

Plaintiff,  
vs.

**DISCOVERY PLAN AND SCHEDULING  
ORDER**

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, OFFICER K. ROSE,  
OFFICER Z. PAPPAS, DOLLAR TREE,  
INC., and DOES 1 through 10, inclusive,

Defendants.

Plaintiff, Deyannia Shipp, and Defendants, Las Vegas Metropolitan Police Department, Officer K. Rose, Officer Z. Pappas, and Dollar Tree, Inc., and pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Practice 26-1, stipulate to and request that the Court enter the following proposed Joint Discovery Plan and Scheduling Order:

1       1.       Meeting: The parties met and conferred via videoconference on February 25, 2025.

2       2.       Pre-Discovery Disclosures: The parties hereby stipulate that they shall make their  
3 initial disclosures of information required by Fed. R. Civ. P. 26 (a)(1) by **Tuesday, March 11,**  
4 **2025**. No changes need to be made to the form or requirements of such disclosures.

5       3.       Areas of Discovery: Discovery will be conducted on all issues including, but not  
6 limited to, all claims and defenses within the scope of the pleadings consistent with the Federal  
7 Rules of Civil Procedure and the Local Rules of this district.

8       4.       Discovery Cut-Off Date: Discovery shall take 180 days, measured from January  
9 27, 2025—the date the first defendant filed an Answer [ECF No. 15]. Accordingly, discovery  
10 must be completed by **Monday, July 28, 2025**.

11       5.       LR 26-1(b)(3) Disclosures (Experts): Disclosure of experts shall proceed according  
12 to LR 26-1(b)(3), except that:

13           [i]       The disclosure of experts and expert reports shall occur on **Thursday, May**  
14 **29, 2025**, which is sixty (60) days before the discovery cut-off date; and

15           [ii]      The disclosure of rebuttal experts and their reports shall occur on **Monday,**  
16 **June 30, 2025**, which is thirty-two (32) days after the initial disclosure of experts.

17       6.       Other Items:

18           a.       Amending the Pleadings and Adding Parties: The parties shall have until  
19 **Tuesday, April 29, 2025**, to file a[ny] motion[s] to amend the pleadings or to add parties. This is  
20 ninety (90) days before the discovery cut-off date and does not exceed the outside limit LR 26-  
21 1(b)(2) presumptively sets of not less than ninety (90) days prior to the close of discovery for filing  
22 such motions.

23           b.       Dispositive Motions: The parties shall have until **Wednesday, August 27,**  
24 **2025**, to file dispositive motion(s). This is 30 days after the discovery cut-off date and does not

1 exceed the outside limit of 30 days following the discovery cut-off date that LR 26-1(b)(4)  
2 presumptively sets for filing dispositive motions.

3       c.     Settlement. The parties have not discussed settlement at this time.

4       d.     Pretrial Order: The joint pretrial order shall be filed by **Friday, September**  
5 **26, 2025**, which is 30 days after the date set for filing dispositive motions in this case. In the event  
6 a timely dispositive motion is filed, the deadline to submit the joint pretrial order shall be  
7 suspended until 30 days after the decision on the dispositive motion or further order of the Court.  
8 The disclosures required by Fed. R. Civ. P. 26(a)(3) shall be made in the joint pretrial order.

9       e.     Alternative Dispute Resolution: The parties hereby certify that they have  
10 met and conferred about the possibility of using alternative dispute-resolution processes including  
11 mediation, arbitration, and early neutral evaluation. The parties believe mediation would be  
12 beneficial.

13       f.     Alternative Forms of Case Disposition: The parties hereby certify that they  
14 have considered consent to trial by a magistrate judgment under 28 U.S.C. § 636(c) and Fed. R.  
15 Civ. P. 73 and use of the Short Trial Program pursuant to General Order 2013-01. The parties do  
16 not wish to utilize either resource at this time.

17       g.     Later Appearing Parties: A copy of this discovery plan and scheduling  
18 order shall be served on any person served after it is entered or, if additional defendants should  
19 appear, within five (5) days of their first appearance. This discovery plan and scheduling order  
20 shall apply to such later appearing parties, unless a stipulation of the parties is approved by the  
21 Court or the Court, on motion for good cause shown, orders otherwise.

22       h.     Extensions or Modifications of the Discovery Plan and Scheduling Order:

23           Pursuant to LR 26-3, a motion or stipulation to extend any date set by the discovery plan,  
24 scheduling order, or other order, must in addition to satisfying the requirements of LR IA 6-1, be

1 supported by a showing of good cause for the extension; be received by the court no later than  
2 twenty-one (21) days before the expiration of the subject deadline; and any request within twenty-  
3 one (21) days of the subject deadline must be supported by a showing of good cause. Any request  
4 made after the expiration of the subject deadline will not be granted unless the movant also  
5 demonstrates that the failure to act was the result of excusable neglect. The motion or stipulation  
6 to extend a discovery deadline or to reopen discovery must include:

7 (a) A statement specifying the discovery completed;

8 (b) A specific description of the discovery that remains to be completed;

9 (c) The reasons by the deadline was not satisfied or the remaining discovery

10 was not completed within the time limits set by the discovery plan; and

11 (d) A proposed schedule for completing all remaining discovery.

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5 || DATED this 13<sup>th</sup> day of March, 2025.

6 | PLC LAW GROUP, APC

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## ORDER

Elyna J. Zouchah  
UNITED STATES MAGISTRATE JUDGE

Date: March 13, 2025